

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice president Regulatory,
Massachusetts

REQUEST: Attorney General, Record Requests

DATED: December 19, 2001

ITEM: AG-VZ RR 1 Please provide a copy of the proposed RFP for conducting the first audit of Verizon MA's Wholesale Performance Assurance Plan

REPLY: Attached is a copy of the draft RFP submitted by Verizon MA for conducting the first audit of the Wholesale Performance Assurance Plan.

VZ RR# 1

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory,
Massachusetts

REQUEST: Attorney General, Record Requests

DATED: December 20, 2001

ITEM: AG-VZ RR 2 Please provide a list of CLECs who have received credits under the Massachusetts Wholesale Performance Plan ("PAP"). Please include the amount of bill credits received.

REPLY: Verizon considers certain data responsive to this request proprietary and competitively sensitive. The data will be made available to the extent provided for in a mutually agreeable Protective Agreement.

Attachment 1 provides a list of CLECs and their respective bill credits determined by the Wholesale Performance Assurance Plan through September 2001. (PAP credits are not allocated to CLECs until the results are final two months after the end of the service month.)

Attachment 2 provides a list of CLECs and their respective bill credits paid under the PAP through September 2001. The actual amount credited to CLECs is offset by credits paid under the *Consolidated Arbitrations* Plan.

Any differences between the values in Attachments 1 and 2 are due to the *Consolidated Arbitrations* offsets.

VZ RR# 2

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory,
Massachusetts

REQUEST: Department of Telecommunications and Energy Record Requests

DATED: December 20, 2001

ITEM: DTE-VZ RR 2 Please provide an update to the summary exchange data contained in the Massachusetts Competitive Profile.

REPLY: Verizon considers certain data responsive to this request proprietary and competitively sensitive. The data will be made available to the extent provided for in a mutually agreeable Protective Agreement.

Attachment 1 provides an updated summary estimate of competitive lines for Massachusetts by central office; this is in the same format as Section A of the Massachusetts Competitive Profile. Information for the Medford/Everett wire center is included with that for Malden. In the Massachusetts Competitive Profile, the entity is designated as Malden/Everett. The Malden central office building houses two distinct wire centers: Malden and Medford/Everett. Please see the Company's reply to data request AG-VZ 1-18.

In order to respond to the record request in a timely manner, the most recent data available was used for each category. For Retail, Resale and UNE-P, the data reflects lines through November 2001. E911 data is available only on snap-shot basis and was captured on January 4, 2002; this provides a reasonable estimate for December 2001.

VZ RR# 3